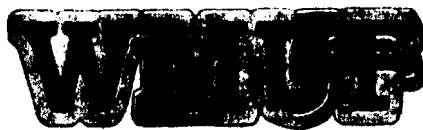


94.1 FM



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DEC 08 1992

MAIL BRANCH

1000 AM

P. O. BOX 1239 • PARIS, TENNESSEE 38242 • PHONE (901)644-9455

RM-8150

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DEC 08 3 35 PM '92
AM EXHIBIT

December 3, 1992

The Secretary
Federal Communications Commission
1919 M. Street, N.W.
Washington, DC 20554

RE: Petition for Rule Making to Modify FM Assignment

Dear Secretary:

Benton-Weatherford Broadcasting, Inc. of Tennessee, Permittee of station WMUF-FM, Paris, Tennessee, hereby respectfully requests that the Commission initiate a rule making to substitute Channel 231C3 for Channel 231A at Paris, Tennessee, and to modify the operation of station WMUF-FM accordingly.

Enclosed is an engineering exhibit in support of this request.

It is our intention to apply for a construction permit on the requested channel when it is assigned.

Very Truly Yours,



Gary D. Benton

Benton-Weatherford Broadcasting of Tenn., Inc.

Attachment

EVANS ASSOCIATES
Consulting Engineers

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MAIL BRANCH

ENGINEERING REPORT

A REQUEST FOR MODIFICATION OF
THE FM TABLE OF ASSIGNMENTS
TO ASSIGN FM CHANNEL 231C3
TO PARIS, TENNESSEE

BENTON-WEATHERFORD BROADCASTING, INC.
OF TENNESSEE

NOVEMBER 1992

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ENGINEERING STATEMENT

This engineering statement and attached figure have been prepared by B. Benjamin Evans of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin, on behalf of Benton-Weatherford Broadcasting, Inc. of Tennessee, permittee of Radio Station WMUF-FM in Paris, Tennessee. This engineering exhibit supports a Petition for Rule Making by Benton-Weatherford Broadcasting to substitute Channel 231C3 for Channel 231A at Paris, Tennessee, and modification of the license to specify operation on Channel 231C3.

Benton-Weatherford Broadcasting is the permittee of Radio Station WMUF-FM, Channel 231A in Paris, Tennessee. Evans Associates has been retained by Benton-Weatherford Broadcasting to conduct an engineering study concerning the feasibility of assigning a Class C3 FM channel to Paris, Tennessee, in place of Channel 231A.

Paris is located in Henry County in western Tennessee. The 1980 U.S. Census population of Paris was 10,728 persons. The total population of Henry County was 28,656 persons in 1980.

The assignment of Channel 231C3 to Paris will meet all distance separation requirements under the FCC Rules if the transmitter is located 17.2 kilometers northeast of Paris. The modification of the WMUF-FM authorization, requested herein, would be contingent upon station WIST in Lobelville, Tennessee, now on Channel 232A, commencing program tests on Channel 233C2 as per their construction permit to make that change.

Therefore, it is respectfully requested that Section 73.202 of the FCC Rules be amended in the following manner:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Paris, TN	231A, 288A	231C3, 288A

It is the petitioner's intention to apply for a construction permit to operate on the FM channel proposed herein, when it is assigned.

The coordinates of the center of Paris are:

36°-18'-12"; 88°-19'-24"

The coordinates assumed for operation of the proposed Class C3 facility are:

36°-22'-40"; 88°-09'-20"

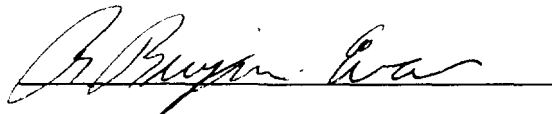
Engineering Statement - Page 2
Paris, Tennessee

Attached as Figure 1 is a spacing study centered at the above coordinates, showing all of the FM assignments pertinent to Channel 231C3 at Paris. With the exception of the present assignment of WIST in Lobelville, the minimum spacings to all existing, authorized and proposed facilities are observed. Therefore, the instant proposal is in compliance with Section 73.207 of the FCC Rules.

From this location, it is 17.2 kilometers to Paris on a bearing of 241° True. Since the predicted 3.16 mv/m contour of a full Class C3 facility extends a nominal 23.2 kilometers, and Paris is less than eight square miles in area, the required city of license coverage is assured.

The public interest would be served by the herein proposed modification in that significant increases would be achieved in area and population to be served by WMUF-FM.

The foregoing statement and the attached figure are true and accurate to the best of my knowledge and belief.



B. Benjamin Evans

November 17, 1992

ATTACHED FIGURE:

Figure 1.....Allocation Study - WMUF-FM, Channel 231C3, Paris, TN

.WMUF-C3

Evans Associates
216 N. Green Bay Road
Thiensville, WI 53092
FM FREQUENCY ALLOCATION STUDY

Channel: 231C3 (94.1 MHz)

Coordinates: 36 - 22 - 40 88 - 9 - 20

Job Title: WMUF-FM - PARIS TN

Φ indicates 73.215 Facility
Cl.A Spacing: CURRENT

CALL STATUS	Φ CITY STATE	CH/CL-ZN FCC#	ERP-kw COMMENTS	HAAT-m DA	LATITUDE LONGITUDE	BEAR-to -from-°T	DIST-km CLEAR-km	REQ -km
WTKBFM CP M	Atwood TN	229A BMPH911223ID	6.0 >Big Tenn Comm Co., I	100	35 57 25 88 41 44	226.2° 45.9°	67.4 +25.9	41.5
WKTG LIC	Madisonville KY	230C2 BLH6056	27.0 >Sound Broadcasters,	90	37 21 5 87 29 25	28.5° 208.9°	123.3 +6.7	116.5
WKTG APP	Φ Madisonville KY	230C2 BPH920903ID	50.0 >Sound Broadcasters,	270	37 21 31 87 29 45	28.1° 208.5°	123.7 +7.2	116.5
WYPE CP	Smyrna TN	231A BPH880511MB	3.00 >Tuned In Broadcastin	61	35 59 43 86 33 29	106.1° 287.0°	149.8 +8.3	141.5
WMIKFM LIC	Mount Vernon IL	231B BLH2581	50. >Withers B/Cting Co.	168	38 22 14 88 55 20	343.2° 162.8°	231.4 +20.8	210.5
WIST LIC	Lobelville TN	232A BLH6567	3.00 >Coleman Broadcasting	91	35 46 21 87 52 5	158.9° 339.1°	72.0\	
ADD	Dyer TN	232A RM7208	>West Haven Broadcast		36 5 53 89 4 41	249.7° 69.1°	88.5 +0.0	88.5
WDBLFM CP	Springfield TN	232A BPH890920IA	3.0 >D.B.L. Broadcasting,	99	36 29 42 86 54 22	83.0° 263.7°	112.8 +24.3	88.5
WDBLFM LIC	Springfield TN	232A BLH7549	3.00 >D.B.L. Broadcasting,	66	36 29 43 86 54 26	83.0° 263.7°	112.7 +24.2	88.5
WDXRFM APP	Golconda IL	232A BMPH911120IC	3.1 >Mason-Dixon Broadcas	137	37 14 4 88 29 48	342.4° 162.2°	99.8 +11.3	88.5
WDXRFM CP	Golconda IL	232A BPH890315MG	3.1 >Mason-Dixon Broadcas	137	37 14 4 88 29 48	342.4° 162.2°	99.8 +11.3	88.5
WIST CP M	Lobelville TN	233C2 BMPH920325IC	21.0 >Coleman Broadcasting	231	35 46 21 87 52 5	158.9° 339.1°	72.0 +16.5	55.5
WXID L	Mayfield KY	234C2 BLH830523AA	50. >West Kentucky Bcg Co	122	36 45 18 88 39 36	313.1° 132.8°	61.6 +6.1	55.5
WOPD CP M	Φ Mayfield KY	234C2 BMPH920218ID	38.0 >West Kentucky Bcg Co	123	36 45 59 88 38 55	314.6° 134.3°	61.7 +6.2	55.5